

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>: CRIMINAL NO. _____</b>
<b>v.</b>	<b>: DATE FILED: _____</b>
<b>MICHAEL MANCUSO</b>	<b>: VIOLATIONS:</b>
	<b>18 U.S.C. § 2113(a)</b>
	<b>(bank robbery – 3 counts)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about July 27, 2007, in the Eastern District of Pennsylvania, defendant

**MICHAEL MANCUSO**

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the Conestoga Bank, 1632 Walnut Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,700, belonging to, and in the care, custody, control, management and possession of Conestoga Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

All in violation of Title 18, United States Code, Section 2113(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 30, 2007, in the Eastern District of Pennsylvania, defendant

**MICHAEL MANCUSO**

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the TD BankNorth, 1607 Walnut Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$603, belonging to, and in the care, custody, control, management and possession of TD BankNorth, the deposits of which were insured by the Federal Deposit Insurance Corporation.

All in violation of Title 18, United States Code, Section 2113(a).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 1, 2007, in the Eastern District of Pennsylvania, defendant

**MICHAEL MANCUSO**

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the TD BankNorth, 1100 Walnut Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$2,605, belonging to, and in the care, custody, control, management and possession of TD BankNorth, the deposits of which were insured by the Federal Deposit Insurance Corporation.

All in violation of Title 18, United States Code, Section 2113(a).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

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**PATRICK L. MEEHAN**  
*United States Attorney*